

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

**Case No.: 17-23683
Judge: GMH
Chapter: Chapter 13**

**In Re: Robert Odeja
Kathleen Odeja**

NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

The Debtors, through Geraci Law, LLC, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of factual and legal basis for the objection. File your written request at:

1. Clerk, U.S. Bankruptcy Court
517 East Wisconsin Avenue, Room 126
Milwaukee, WI 53202-4581

and provide copies to

United States Trustee
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 430
Milwaukee, WI 53202

Scott Lieske
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Geraci Law, LLC
Andrew Mark Golanowski
2505 N. Mayfair Rd. #101
Wauwatosa, WI 53226

Robert Odeja
Kathleen Odeja
1320 E. Oakwood Rd.
Oak Creek, WI 53154

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the Court may decide that you do not oppose the request and may enter an order modifying the Plan.

REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponents of this modification are the Debtors.
2. This is a request to modify a Chapter 13 Plan:
 - a. ☐ post-confirmation
 - b. ☒ pre-confirmation
 - i. Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
 - ii. Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:
3. The Proponent wishes to modify the Chapter 13 Plan to do the following: Correct the name of the mortgage creditor.
4. The reason(s) for the modification is/are: see above.
5. Select A or B:
 - A. ☐ The confirmed Chapter 13 Plan is modified as follows:
 - B. ☒ The unconfirmed Chapter 13 Plan is modified as follows: Section 6(B) of the plan is amended to state that the Debtors shall make post petition mortgage payments for their real estate at 1320 E. Oakwood Rd., Oak Creek, WI 53154 direct to DLJ Mortgage Capital, Inc., as serviced by Select Portfolio Servicing, Inc.
Special Provision 3 of section 10 of the plan is amended to state: Debtors have entered into the trial period of a loan modification with Select Portfolio Servicing, Inc. The Debtors' prepetition mortgage arrearage will be cured with the loan modification. Should the Debtors not obtain a permanent loan modification by December 31, 2017, Debtors shall amend their Plan to pay the prepetition arrearage through the Plan.

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the even of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

- 6. BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

CERTIFICATION

Complete one of the certifications below:

1. I/We, _____, the debtor(s) in this case, certify that I/we have reviewed the modification to the Chapter 13 plan proposed in this motion, and I/we authorize my/our attorney to file it with the court.

Debtor

Date

Debtor

Date

OR

2. I, Andrew Golanowski, attorney for the debtor(s), certify that I have reviewed the modification proposed above with the debtor(s), and that the debtor(s) has/have authorized me to file it with the court.

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Monday, May 22, 2017.

By: /s/ Andrew Mark Golanowski
Andrew Mark Golanowski
Attorney for Debtor
Bar #: 1055499

Andrew Mark Golanowski
Law Offices of Peter Francis Geraci
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (312) 332-1800
Fax: (877) 247-1960
Email: wal@geracilaw.com

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EASTERN DISTRICT OF WISCONSIN**

**Case No.: 17-23683
Judge: GMH
Chapter: Chapter 13**

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Kathleen Odeja**

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Monday, May 22, 2017:

Robert Odeja
Kathleen Odeja
1320 E. Oakwood Rd.
Oak Creek, WI 53154

SEE ATTACHED LIST

Additionally, the documents referenced above were also served via electronic means on the following individuals on Monday, May 22, 2017:

United States Trustee
Eastern District of Wisconsin
517 E. Wisconsin Ave.
Milwaukee, WI 53202

Scott Lieske
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Dated this Monday, May 22, 2017.

By: /s/ Andrew Mark Golanowski
Andrew Mark Golanowski
Attorney of the Debtor
Bar #: 1055499

Andrew Mark Golanowski
Law Offices of Peter Francis Geraci
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (312) 332-1800
Fax: (877) 247-1960
Email: wal@geracilaw.com

Label Matrix for local noticing
0757-2
Case 17-23683-gmh
Eastern District of Wisconsin
Milwaukee
Mon May 22 13:33:15 CDT 2017

AMEX
Attn: Bankruptcy Dept.
Po Box 297871
Fort Lauderdale, FL 33329-7871

Bank of America NA
Attn: Bankruptcy Dept.
5401 N Beach St
Fort Worth, TX 76137-2733

CBE Group
Attn: Bankruptcy Dept.
1309 Technology Pkwy
Cedar Falls, IA 50613-6976

Capital One
PO Box 5253
Carol Stream, IL 60197-5253

Century Liquidation Inc
35 E. Grassy Sprain Road #210
Yonkers, NY 10710-4613

Chase CARD
Attn: Bankruptcy Dept.
Po Box 15298
Wilmington, DE 19850-5298

Equifax
Attn: Bankruptcy Dept.
PO Box 740241
Atlanta, GA 30374-0241

IRS Priority Debt
Bankruptcy Dept.
PO Box 7346
Philadelphia, PA 19101-7346

Kohls/capone
N56 W17000 Ridgewood Drive
Menomonee Falls, WI 53051-7096

DLJ Mortgage Capital, Inc.
c/o Gray & Associates, LLP
16345 W Glendale Dr
New Berlin, WI 53151-2841

(p)AMERICOLLECT INC
PO BOX 2080
MANITOWOC WI 54221-2080

Barclays Bank Delaware
125 S. West Street
Wilmington, DE 19801-5014

CBE Group Inc
PO Box 2337
Waterloo, IA 50704-2337

(p)CAPITAL ONE
PO BOX 30285
SALT LAKE CITY UT 84130-0285

Century Liquidation, Inc.
9858 Clint Moore Road Suite C-11 #2
Boca Raton, FL 33496-1034

Chase-BP
PO Box 15298
Wilmington, DE 19850-5298

Experian
Attn: Bankruptcy Dept.
PO Box 2002
Allen, TX 75013-2002

James Schulgit
Bankruptcy Dept.
1001 W Glen Oaks lane STE 105
Mequon, WI 53092-3369

MHFS
10200 W Innovation Drive
Milwaukee, WI 53226-4826

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Bank of America
Bankruptcy Department
450 American Street
Simi Valley, CA 93065-6285

(c)CBE GROUP
131 TOWER PARK DR STE 100
WATERLOO IA 50701-9374

Capl/Bostn
PO Box 5253
Carol Stream, IL 60197-5253

Century Liquidation INC
Bankruptcy Dept.
6640 Shady Oak Road STE 300
Eden Prairie, MN 55344-7710

Chase BP
Bankruptcy Dept.
PO BOX 15298
Wilmington, DE 19850-5298

Crivitz Lumber Company
Bankruptcy Dept.
611 Main PO BOX 190
Crivitz, WI 54114-0190

GEICRB/Lowes
PO Box 103065
Roswell, GA 30076

Johnson, Blumberg and Assoc
230 W. Monroe St #1125
Chicago, IL 60606-4723

Mcydsnb
9111 Duke Blvd
Mason, OH 45040-8999

Milwaukee County Circuit Court
Bankruptcy Dept.
901 N. 9th ST.
Milwaukee, WI 53233-1425

ONeMain
PO Box 3251
Evansville, IN 47731-3251

Ocwen LOAN Servicing L
Attn: Bankruptcy Dept.
12650 Ingenuity Dr
Orlando, FL 32826-2703

Ocwen LOAN Servicing L
Attn: Bankruptcy Dept.
3451 Hammond Ave
Waterloo, IA 50702-5345

Office of the U. S. Trustee
517 East Wisconsin Ave.
Room 430
Milwaukee, WI 53202-4510

Optimum Outcomes
PO Box 660943
Dallas, TX 75266-0943

Optimum Outcomes INC
Attn: Bankruptcy Dept.
2651 Warrenville Rd Ste
Downers Grove, IL 60515-5544

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Select Portfolio Servicing
PO Box 65277
Salt Lake City, UT 84165-0277

(p)SPRINGLEAF FINANCIAL SERVICES
P O BOX 3251
EVANSVILLE IN 47731-3251

State Collection Service Inc.
Bankruptcy Dept
2509 South Stoughton Road
Madison, WI 53716-3314

THD/CBNA
PO Box 6497
Sioux Falls, SD 57117-6497

TNB - Target
Attn: Bankruptcy Dept.
PO Box 673
Minneapolis, MN 55440-0673

Target NB
Attn: Bankruptcy Dept.
PO Box 673
Minneapolis, MN 55440-0673

Transunion
Attn: Bankruptcy Dept.
PO Box 1000
Chester, PA 19022-1023

WE Energies
Elaine
333 W. Everett Street
Room A130
Milwaukee, WI 53203-2803

Wheaton Franciscan
PO Box 860496
Minneapolis, MN 55486-0496

Wheaton Franciscan Med. Group
Bankruptcy Department
PO Box 68-9711
Milwaukee, WI 53268

Wisconsin Dept. of Revenue
Special Procedures Unit
PO Box 8901
Madison, WI 53708-8901

Wisconsin Electric POW
Attn: Bankruptcy Dept.
231 W Michigan St # A130
Milwaukee, WI 53203-2918